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9 Proposed Counsel for Debtor
10 Ivory Trading Company, Inc. dba Ivory Headwear
11 Co.

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14 UNITED STATES BANKRUPTCY COURT
15 FOR THE DISTRICT OF OREGON

16 In re
17 Ivory Trading Company, Inc. dba Ivory
18 Headwear, Co.

19 Debtor.

20 Ivory Trading Company, Inc. dba Ivory
21 Headwear Co.,

22 Plaintiff,

23 v.

24 The Bank of the West,

25 Defendant.

26 Case No. 15-32026-pcm11

Adv. Proc. No.

**MOTION FOR TEMPORARY
RESTRANDING ORDER**

By Plaintiff Ivory Trading Company, Inc.

EXPEDITED HEARING REQUESTED

27 Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bank. P. 7001(7) and 7065, Debtor and
28 Plaintiff Ivory Trading Company, Inc. dba Ivory Headwear, Co. ("Plaintiff" or "Debtor") move
29 this Court for a temporary restraining order:

30 1. Prohibiting Defendant Bank of the West ("Defendant") their agents, servants,
31 employees, attorneys and those persons in active concert or participation with them from

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1 undertaking or pursuing any collection efforts against Mr. Michael P. Ivory, pending a hearing
2 and this Court's ruling on the Order to Show Cause Why a Preliminary Injunction Should Not
3 Issue; and,

4 2. Staying Defendant's threat to record a Confession of Judgment in state court
5 against Debtor and Mr. Michael P. Ivory, pending a hearing and this Court's ruling on the Order
6 to Show.

7 The Temporary Restraining Order would remain in effect until the Court has an
8 opportunity to conduct a hearing and issue its ruling on the Debtor's request for a preliminary
9 injunction.

10 This Motion is supported by Plaintiff's Adversary Proceeding Complaint, the
11 accompanying Memorandum of Law, and the Declaration of Michael P. Ivory filed herein.

12 DATED: April 24, 2015

PERKINS COIE LLP

13 By: /s/ Douglas R. Pahl
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